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Pratt & Whitney
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September 25, 2000

Federal Aviation Administration
800 Independence Avenue S.W.
Washington, D.C. 20591

Attention: Mr. Thomas McSweeney - Associate Administrator for Regulation
and Certification

Reference: FAA Tasking to Aviation Rulemaking Advisory Committee, Federal
Register page 58843, dated December 11, 1992.

Dear Tom,

The ARAC Transport Airplane and Engine Issues Group is pleased to submit the
attached proposed NPRM and Advisory Circular regarding HIRF as an ARAC
recommendation. These documents were prepared by the Electromagnetic
Effects Harmonization Working Group in accordance with the reference tasking.

*TASK #1
AIR-93-739-A*

These documents have had a legal review but economic review has not been
completed. It is the understanding of TAEIG that the economic review is only
partially complete because it has been given a relatively low priority within APO.

TAEIG requests your assistance in raising the priority within the FAA for the
processing of this package so that Federal Register publication of the NPRM and
Advisory Circular availability notice can occur as soon as possible. The FAA and
JAA have used Special Conditions to implement these HIRF requirements on all
certification programs for the last several years. Timely publication of this rule
would relieve the FAA of the administrative burden associated with continued
processing of Special Conditions. TAEIG also believes that the fact that Special
Conditions have been applied for several years now to all certification projects
should make the economic evaluation relatively straightforward since there is no
additional cost to comply with the NPRM requirements beyond that which already
exists when the Special Conditions have been applied.

In addition, recent requirements termed the EMC Directive have been instituted by the European Union regarding the import of electrical equipment. The proposed HIRF requirements have been used as a part of the basis for a recommended exemption of aircraft from this directive, thus relieving a large compliance burden from industry in showing compliance with this EU requirement.

Your support in expediting publication of this package is appreciated.

Sincerely yours,



C. R. Bolt

Assistant Chair, TAEIG

Copies: Brenda Courtney, FAA-Washington, DC-AIR
Kris Carpenter, FAA-NWR
Effie Upshaw, FAA-Washington, DC
John McGraw, FAA-Washington, DC
Joe Cross, Raytheon (EEHWG Chair)
John Rodgers, FAA-Washington, DC.-Office of Policy and Plans